

EXHIBIT 21

From: Knudson, Jacquelyn Swanner
Sent: Friday, March 12, 2021 8:03 PM
To: donald@creadorelawfirm.com
Cc: McClammy, James I.; Townes, Esther C.; EXT RHoff@wiggin.com;
Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Scott R. Bickford;
KentHarrison Robbins Esq.
Subject: RE: 19-CV-23649 - RDD NASAHC RULE 2004 MOTION [DKT. NOS. 2139 & 2155] REPLY
& SUPPORTING DECLARATION COURTESY COPY

Don—

We have reviewed the advance copy of the NAS Committee's Reply, Declaration, and exhibits. Though this has not yet been filed, we take issue with how you choose to present the Debtors' extraordinary and ongoing cooperation in these cases. It is particularly frustrating given the efforts we have made over the past year to discuss discovery issues and provide you with the requested information that you continue to take this tone, and cast needless aspersions, in the papers you submit or intend to submit to the Court.

In spite of that, we are willing to continue discussions and hopefully find a way to work this out without troubling the Court at this critical juncture in these cases. First, we believe a large number of CCDS have already been produced to you. We suggest that you look at what you already have. We will also review which CCDS have been produced. If we find other relevant CCDS that have not yet been produced, we will make those available to you in short order. To the extent you are having trouble locating the CCDS in the documents you already have access to, we are also willing to see if we can direct you to where they appear in the production.

Second, with respect to various scientific studies, it is clear that nothing has been hidden from FDA since the studies you reference were cited in various submissions to FDA to which you have access in the various productions. This is second time that you identify so called "hidden studies" that were, in fact, submitted to FDA and produced in these cases. For example, in paragraph 6 of your Reply you quote from the 1994 NDA for OxyContin, which references "non-GLP range-finding studies in nonpregnant animals," and then state that "the underlying testing data, protocols and processes, and conclusions surrounding Debtors' performance of non-GLP studies and range-finding (and range-dosing) studies, has not been disclosed to NAS Children Ad Hoc despite demands duly made." However, results of the cited non-GLP study we believe are found starting at Bates page PURCHI-000575925, and the full study can be found starting at Bates page PURCHI-000576165, which is in the materials that have been made available to you. Please confirm that this is the study you assert you have not seen and let us know whether you searched for it in the productions before making that assertion.

We are available to discuss your request for "Preclinical Toxicology Studies" and are willing to conduct reasonable searches for additional studies that you specify with a reasonable level of detail. For example, in paragraph 5 of your Reply you reference a "series of citations to embryo-fetal animal studies referenced among documents produced by Debtors." If this is, in fact, the type of information you are looking for and you are unable to find it in the productions to which you have access, if you will provide us with those cites, we will undertake a reasonable search for the underlying studies and make those available to you, to the extent they exist within the Debtors' possession, custody, or control.

Please let us know your availability for a call on Monday, March 15. We are available 11 a.m.-1 p.m. and 4-6 p.m.

Best,
J.I.M. & Jacquelyn

Jacquelyn Swanner Knudson

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From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>

Sent: Thursday, March 11, 2021 1:35 PM

To: McClammy, James I. <james.mcclammy@davispolk.com>

Cc: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Scott R. Bickford <srb@mbfirm.com>; KentHarrison Robbins Esq. <KHR@khrlawoffices.com>; Townes, Esther C. <esther.townes@davispolk.com>; don creadore <Donald@creadorelawfirm.com>

Subject: RE: 19-CV-23649 - RDD NASAHC RULE 2004 MOTION [DKT. NOS. 2139 & 2155] REPLY & SUPPORTING DECLARATION COURTESY COPY

Jim-

Regarding Exhibit 'G', we are attaching the May 5, 2011 transmittal email relating to the subject matter; we obtained permission too late last evening to include it in the courtesy copy we sent to you. The document had been produced by the IACs, as: IACS_ESI_003502069.

We are happy to discuss.

Many thanks,

Don

o/b/o NAS Children Ad Hoc Committee

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-----Original Message-----

From: "McClammy, James I." <james.mcclammy@davispolk.com>

Sent: Thursday, March 11, 2021 8:18am

To: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>, "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>

Cc: "Scott R. Bickford" <srb@mbfirm.com>, "Kent Harrison Robbins Esq." <KHR@khrlawoffices.com>, "Townes, Esther C." <esther.townes@davispolk.com>

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Don – We are reviewing and will revert after we have a chance to connect with the client.

J.I.M.

From: donald@creadorelawfirm.com <donald@creadorelawfirm.com>

Sent: Wednesday, March 10, 2021 9:15 PM

To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner
<jacquelyn.swanner@davispolk.com>

Cc: don creadore <Donald@creadorelawfirm.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Harrison Robbins Esq.
<khr@khrlawoffices.com>

Subject: 19-CV-23649 - RDD NASAHC RULE 2004 MOTION [DKT. NOS. 2139 & 2155] REPLY & SUPPORTING DECLARATION
COURTESY COPY

Jim-

In the spirit of continued cooperation and as a professional courtesy, please find attached a copy of the NAS Children Ad Hoc's Reply and accompanying Supporting Declaration with exhibits ('A', 'B1', 'B2', 'B3', 'C', 'D', 'E', 'F' and 'G'); it is to be filed with the court imminently while we leave open working cooperatively with the Debtors to narrow matters. At the very least, we are suggesting that we discuss a hearing date and am proposing March 24, 2021; Judge Drain's courtroom deputy, Ms. Dorothy Li, is also aware of this potential hearing date.

May we please have your thoughts?

Many thanks,

Don

o/b/o NAS Children Ad Hoc Committee

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